



MONTANA
TELECOMMUNICATIONS
ASSOCIATION

April 26, 2012

Ms. Marlene Dortch, Secretary
Federal Communications Commission
455 12th Street, SW
Washington, D.C. 20554

Re: *In the Matter of Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Advancing Broadband Availability through Digital Literacy Training; and Federal-State Joint Board on Universal Service.* WC Docket Nos. 11-42; 03-109; and 12-23; and CC Docket No. 96-45.

Dear Ms. Dortch,

On April 24, the undersigned met with Kim Scardino, Garnet Hanly and Jonathan Lechter of the Telecommunications Access Policy Division. We discussed the Commission's *Lifeline Reform Order and Further Notice of Proposed Rulemaking* (FCC 12-11. Rel. February 6, 2012.).

MTA noted the substantial compliance burdens imposed on rural telecommunications providers and their consumers alike resulting from the recent *Lifeline Order*. MTA urged the Commission to establish both a national address/name verification database and a national program eligibility database prior to imposing such compliance burdens on carriers and consumers. MTA offered to work with the Commission to identify the fiscal and privacy challenges involved in establishing a national eligibility database, and suggested beginning with only Medicaid eligibility in the national database.

MTA also reiterated its concerns—as articulated in MTA's April 18, 2012 comments on the *Lifeline FNPRM*—about the uncontrolled growth of the Lifeline Program and the risk such growth poses to the Universal Service Fund if the *Lifeline Order* fails to contain costs as projected. MTA recommended elimination of the Lifeline “identical support” mechanism by which prepaid wireless Lifeline-only ETCs receive the same level of Lifeline support as other ETCs, despite no relationship between the amount of support and the cost of providing service.

Respectfully submitted,

/s/

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cc. Kim Scardino, Garnet Hanly, Jonathan Lechter